

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ALEX E. RINEHART, On Behalf of :  
Himself And All Others Similarly Situated, :  
 :  
Plaintiff, :

VS.

Civil Action No: 08 Civ. 5598 (MGC)

LEHMAN BROTHERS HOLDINGS INC.,  
Richard S. Fuld, Jr., Michael L. Ainslie,  
John F. Akers, Roger Berlind, Thomas H.  
Cruikshank, Marsha Johnson Evans,  
Christopher Gent, Roland A. Hernandez,  
Henry Kaufman, John D. Macomber, Erin  
M. Callan, Wendy M. Uvino, The  
Employee Benefit Plans Committee, and  
John Does 1-10,  
  
Defendants.

JO ANNE BUZZO, individually and on :  
behalf of all others similarly situated, :  
 :  
 :  
Plaintiff, :  
 :  
vs. :  
 :

Civil Action No: 08 Civ. 6245 (UA)

LEHMAN BROTHERS HOLDINGS INC.,  
Wendy M. Uvino, Lehman Brothers  
Holdings Inc. Employee Benefit Plans  
Committee, John Does 1-10, Henry  
Kaufman, John F. Akers, Roger S. Berling,  
Marsha Johnson Evans and Roland A.  
Hernandez.  
  
Defendants.

MONIQUE MILLER FONG, On Behalf Of :  
Herself And All Others Similarly Situated, :  
 :  
Plaintiff, :  
 :  
vs. :  
 :

Civil Action No: 08 Civ. 6282 (UA)

LEHMAN BROTHERS HOLDINGS INC., :  
 RICHARD S. FULD, JR., MICHAEL L. :  
 AINSLIE, JOHN F. AKERS, ROGER S. :  
 BERLIND, THOMAS H. CRUIKSHANK, :  
 MARSHA JOHNSON EVANS, SIR :  
 CHRISTOPHER GENT, JERRY A. :  
 GRUNDHOFFER, ROLAND A. :  
 HERNANDEZ, HENRY KAUFMAN, :  
 JOHN D. MACOMBER, ERIN M. :  
 CALLAN, WENDY M. UVINO, THE :

EMPLOYEE BENEFIT PLANS :  
COMMITTEE, and JOHN DOES 1-10, :  
 :  
Defendants. :  
-----X

**NOTICE OF MOTION AND MOTION FOR CONSOLIDATION OF RELATED  
ACTIONS AND FOR APPOINTMENT OF INTERIM LEAD PLAINTIFF,  
INTERIM LEAD COUNSEL AND INTERIM LIAISON COUNSEL**

PLEASE TAKE NOTICE THAT Plaintiff Jo Anne Bozzo (“Plaintiff” or “Buzzo”) hereby moves this Court for the entry of [Proposed] Pretrial Order No. 1 submitted to the Court herewith which:

1. Consolidates the above captioned actions;
2. Appoints Buzzo as Lead Plaintiff for the Lehman Brothers Savings Plan (“Plan”) and on behalf of a class of participants and beneficiaries of that Plan (“Participants”);
3. Appoints Izard Nobel L.L.P. (“Izard Nobel”) Interim Lead Counsel for the ERISA class plaintiffs;
5. Appoints Sarraf Gentile L.L.P. (“Sarraf Gentile”) as Interim Liaison Counsel for the ERISA class plaintiffs.

**WHEREFORE**, for the reasons set forth in the supporting documents filed herewith, Plaintiff respectfully requests that this Court grant this motion and enter the [Proposed] Pretrial Order No. 1 submitted to the Court herewith.

Dated: July 15, 2008

Respectfully submitted:

**SARRAF GENTILE LLP**

By: /s/ Ronen Sarraf  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2008: (i) a true and correct copy of the foregoing motion and accompanying papers were electronically filed using the Court's ECF system which will send a notification of such filing to all users of the ECF system; (ii) a true and correct copy of the [Proposed] Pretrial Order No. 1 was emailed to judgments@nysd.uscourts.gov; and, (iii) a true and correct copy of the same was served by U.S. Mail upon the following:

Jonathan K. Youngwood  
Simpson Thatcher & Bartlett LLP  
425 Lexington Avenue  
New York, NY 10017-3954

/s/ Ronen Sarraf